



April 5, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Maryland Space Business Roundtable Luncheon (MSBR) on April 11, 2011

On Monday, April 11, 2011, the Maryland Space Business Roundtable (MSBR), a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting a luncheon at Martin's Crosswinds, in Greenbelt, Maryland, at 11:30 a. m. The guest speaker will be Senator Barbara Mikulski.

Approximately 500 people are expected to attend, including representatives from Congress; state and local government; academia; industry; Federal agencies such as NASA, NOAA, and DoD; the public; and media. The estimated cost of the luncheon, including all food and beverages, is \$23.00 per person. I find that this luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow attendees to exchange information on various NASA programs with other attendees interested in aerospace. Accordingly, NASA employees whose duties do not substantially affect MSBR or a majority of its members, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the luncheon.

However, NASA employees whose duties may substantially affect the MSBR or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over the printed name.